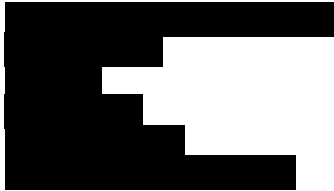


APP203827 Proposal to amend the Fire Fighting Chemicals Group Standard 2017

Submission Reference no: 12

Robert Fenton, **New Zealand Fire Equipment Manufacturers Association Incorporated**
Care of Pertronic Industries Ltd



Submitter Type: Not specified
Source: Web Form
Overall Position: Support in Part

Overall Notes:

Clause

What is the reason for making the submission?

Notes

The New Zealand Fire Equipment Manufacturers' Association (NZFEMA) is an industry group operating within the umbrella of Business New Zealand, and represents the manufacturers and distributors of fire protection equipment, specifically fire alarms, sprinklers, portable fire fighting equipment and special hazards detection and suppression systems. Association members have a direct interest in, and will be directly affected by, the outcome of this consultation.

Clause

Do you wish to speak at a hearing?

Position

No

Notes

Clause

What is your preferred outcome of this consultation?

Notes

NZFEMA supports and endorses the submission made by the Fire Protection Association NZ (FPA), in particular that the proposed removal of C6 fluorotelomer agents in certain applications is delayed pending the development, testing and validation of viable alternative products, which NZFEMA members understand are presently being developed. NZFEMA further supports the FPA recommendation to adopt the "State of Washington" approach in high challenge risks where there are currently no viable equivalent alternatives.

Clause

Do you consider there are any applications for which fluorine-free foams are not suitable or do not have relevant approvals? If yes, please specify.

Position

Yes

Notes

FPA submission to this point is fully supported by NZFEMA

Clause

Do you have any concerns about fluorine-free foams potentially containing other persistent, toxic and/or bioaccumulative compounds?

Position

Yes - please specify

Notes

NZFEMA supports the FPA commentary to this point

Clause

Which is your preferred option?

Position

Grant permissions to continue to use C6 foams

Notes

NZFEMA supports the FPA recommendation to adopt the "State of Washington" approach in this regard

Clause

Can you estimate the cost to your business of phasing out C6 AFFF?

Position

No

Notes

The submitter have elected to withhold their personal details from publication.